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14 UNITED STATES DISTRICT COURT

15 FOR THE DISTRICT OF NEVADA

16 UNITED STATES OF AMERICA, )  
17 Plaintiff, )  
18 vs. )  
19 LANCE K. BRADFORD, )  
20 Defendant. )

21 Case No. 2:19-CR-00222-KJD-BNW  
22 **STIPULATION AND ORDER TO  
23 CONTINUE MOTION DEADLINES  
(Second Request)**

24 IT IS HEREBY STIPULATED and agreed, by and between, LANCE K. BRADFORD,  
25 Defendant, by and through his counsel, RICHARD A. WRIGHT, ESQUIRE, and RUSSELL E.  
26 MARSH, ESQUIRE, WRIGHT MARSH & LEVY, and NICHOLAS A. TRUTANICH, United  
27 States Attorney, by STEVEN W. MYHRE, Assistant United States Attorney, that the parties shall  
28 have to and including July 3, 2020, within which to file any pretrial motions. The parties shall have  
14 days within which to file responses to any motions; and seven days after that date to file any reply.

29 This stipulation is entered into for the following reasons:

30 1. On September 20, 2019, this Court entered an Order designating this case as complex  
31 and setting a schedule for filing pretrial motions, with such motions being due on or before May 4,  
32 2020; responses due 14 days later; and any replies due within one week after that. (ECF No. 17.)

33 2. The motions deadline has been previously extended for 30 days to June 3, 2020. (ECF  
34 No. 21.)

1       2. Defendant Bradford requires additional time to prepare pretrial motions, among other  
2 reasons, due to the voluminous nature of the discovery in this case and scheduling and logistics  
3 issues caused by the coronavirus pandemic.

4       3. Failure to grant this request for additional time would deny the parties the opportunity  
5 to address properly prepare and brief appropriate pretrial motions.

6       4. Additionally, continuance of the current motions deadlines would be appropriate to  
7 promote the goals set forth under 18 U.S.C. § 3161(h)(7)(A), which provides that a court may grant  
8 a continuance on the basis of finding that the “ends of justice” served by a continuance outweigh the  
9 best interest of the public and the Defendant in a speedy trial.

10       5. Additionally, denial of this request for continuance would result in a miscarriage of  
11 justice.

12       6. For all of the above stated reasons, the ends of justice would be best served by a  
13 continuance of the motions deadlines as set forth above.

14       DATED: June 1, 2020.

15 WRIGHT MARSH & LEVY

16 By /s/ Russell E. Marsh  
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20 Counsel for Defendant Bradford

NICHOLAS A. TRUTANICH  
United States Attorney

By /s/ Steven W. Myhre  
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## ORDER

Based on the Stipulation between counsel for Defendant Bradford and the Government, and good cause appearing therefore, the Court hereby orders that the parties shall have to and including July 3, 2020, within which to file any pretrial motions; they shall have 14 days within which to file response to any motions; and seven days to file any replies.

Dated: 6/2/2020

BRENDA N. WEKSLER  
U.S. MAGISTRATE JUDGE